

REMARKS

The office action of April 21, 2003, has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested.

Claims 1-34 remain in this application.

Objection to the Declaration

The Examiner has objected to the declaration. Applicants will submit a revised declaration with citizenship. Applicants note that there are only three inventors in this application.

Objection to the Specification

The Examiner objects to the specification for improper incorporation by reference and the inclusion of browser executable code. First, Applicants have amended the subject paragraphs of the specification to set forth a proper incorporation by reference. Second, Applicants note that the listed web site is not an active link as defined by MPEP § 608.01. In particular, Applicants are only interested in providing a location from which the Open eBook information may be obtained. Third, Applicants submit a copy of the Open eBook information referenced in the background of the disclosure. Accordingly, Applicants submit the objection to the specification has been overcome.

Objections to the Claims

Claims 1, 15, and 28 stand objected to for various informalities. The claims have been amended to address these informalities. The objection to the claims is believed overcome.

Rejection of Claims under 35 U.S.C. 112, First and Second Paragraphs

Claims 13 and 26 stand rejected under 35 U.S.C. 112, first and second paragraphs. Applicants respectfully traverse.

Applicants have amended claims 13 and 26 to more clearly point out the relationship between the command and the applet.

Rejection of Claims under 35 USC 103 over Humplemen and Haverstock

Claims 1-17, 19, 21-28, 30, 32, and 34 stand rejected over the combination of Humplemen and Haverstock. Applicants traverse.

Claim 1 recites, *inter alia*:

- “b) locating an alias within the link;
- c) identifying a pre-defined system command associated with the alias; ...”

As noted by the Examiner, Humplemen fails to teach or suggest these recitations. The Examiner relies on Haverstock. Haverstock relates only to linking to other objects, not to a command as claimed. Combining Humplemen and Haverstock would have resulted in a system where one may use links to activate commands (from Humplemen) and separate aliases to access other documents (specifically, other files) (from Haverstock).

The Examiner asserts that the two references are in analogous arts. However, there is no teaching that combines the two as they both handled linking in divergent approaches. First, Humplemen addresses the ability to link directly to commands. Second, Haverstock addresses “file not found” errors when linking to files. These two different approaches linking to two different type of destinations (a control in one case and a file in the other).

The Examiner asserts that one could be used in place of the other. However, the motivation provided in the references does not support the combination. For instance, the motivation to use the technique of Haverstock is to reduce the occurrence of “file not found” errors. However, this error is not present with commands to the extent shown by Haverstock. Rather, Humplemen appears to show a system with fixed links, that should never encounter these errors (as opposed to a large database that may have file names appearing and disappearing constantly).

Accordingly, Applicants submit that the two references are not combinable and, even if combined, would not teach or suggest the combination as claimed.

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Amendment dated July 17, 2003
Reply to Office Action of April 21, 2003

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.


All rejections having been addressed, applicant respectfully submits that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same.

Respectfully submitted,

BANNER & WITCOFF, LTD.

Dated: July 17, 2003

By:

A handwritten signature in black ink, appearing to read "Chris Glembocki", written over a horizontal line.

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